

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

DONALD A. MOORE, On Behalf of Himself ) and All Others Similarly Situated, )  Plaintiff, )  vs. )	)	Case No. 08-CV-192
ELECTRONIC DATA SYSTEMS CORP., ) RONALD A. RITTENMEYER, JEFFREY M. ) HELLER, RAY L. HUNT, W. ROY ) DUNBAR, S. MALCOLM GILLIS, ELLEN ) M. HANCOCK, EDWARD A. KANGAS, ) JAMES K. SIMS, R. DAVID YOST, ) ERNESTO ZEDILLO and HEWLETT ) PACKARD COMPANY, )  Defendants. )	)	

**AGREED MOTION TO STAY ALL PROCEEDINGS**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Donald A. Moore (“Plaintiff Moore”) hereby files this agreed motion to stay the above-captioned action and respectfully avers as follows:

1. The above-captioned putative class action has settled as part of a global settlement involving putative class actions in Texas state court that were filed prior to the instant litigation and that arose out of the same facts and circumstances, and involve the same putative class of EDS stockholders. The Texas state court actions were consolidated as *In re Electronic Data Systems Class Action Litigation, Cause No. 366-01078-2008* in the 366<sup>th</sup> Judicial District, Collin County District Court (the “State Court Action”).

2. The parties to the global settlement intend to proceed with the settlement in the State Court Action. The parties to that action will seek preliminary approval of the settlement by the state court on or before the first week of September 2008, followed by notice to the stockholders of the settlement and final approval of the settlement by the state court in the State Court Action.

3. Plaintiff Moore respectfully requests that the Court stay the instant litigation for 150 days to permit these events to occur.

4. The parties have agreed, subject to court approval, that a motion to dismiss with prejudice will be filed in the above-captioned action within one (1) business day of the entry of the order of dismissal with prejudice in the State Court Action following final approval of the settlement by the state court.

5. To date, no class has been certified in the above-captioned action.

6. The parties of the above-captioned action will keep the Court apprised of settlement proceedings in the State Court Action.

7. For the Court's convenience, a Proposed Order is submitted herewith.

Respectfully submitted,

/s/William B. Federman  
William B. Federman  
State Bar No. 00794935  
FEDERMAN & SHERWOOD  
10205 North Pennsylvania Ave.  
Oklahoma City, OK 73120  
Telephone: (405) 235-1560  
Facsimile: (405) 239-2112  
-and-  
2926 Maple Ave.  
Suite 200  
Dallas, Texas 75201  
wfederman@aol.com  
-and-

Patricia Weiser  
Sandra G. Smith  
Debra S. Goodman  
THE WEISER LAW FIRM, PC  
121 North Wayne Ave., Suite 100  
Wayne, PA 19087  
Telephone: (610) 225-0273  
Facsimile: (610) 225-2678

Attorneys for Plaintiff Donald A. Moore

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2008 I served via ECF filing the foregoing document to all parties registered with the ECF filing system.

/s/ William B. Federman  
William B. Federman